



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Peter Brereton, Treasurer  
KeyCorp Political Action Committee  
127 Public Square  
Cleveland, OH 44114

Identification Number: C00073155

FEB 15 2002

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Brereton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

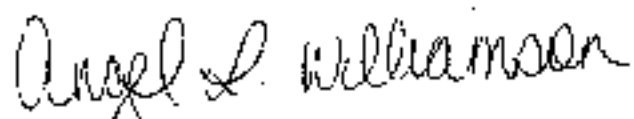
-Schedule B supporting Line 23 of your report discloses a contribution(s) to LeadershipPAC 2002; however, you have disclosed "Michael G. Oxley (OH-4-R)" in the purpose of disbursement field(s). Please clarify whether this was an earmarked contribution(s) made by your committee through LeadershipPAC 2002 committee to this candidate, or if you made the contribution to the political committee exercising no direction or control over how the funds were to be used. If the latter is the case, please do not include the candidate's name in the purpose of disbursement field. Please amend your report to clarify the ultimate recipient of this contribution(s).

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis

Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Angel L. Williamson".

Angel L. Williamson

Senior Reports Analyst

Reports Analysis Division

